

EXHIBIT G

Application For Entry of Default Against Defendant W.R. Grace & Co. [DI 83]

Rune Kraft
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108 West 13th Street
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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

Rune Kraft,
Plaintiff,

vs.

Chevron Corporation, et al.,
Defendants.

Case No. CV-21-00575-PHX-DJH

The Honorable Diane J. Humetewa

**APPLICATION FOR ENTRY OF
DEFAULT AGAINST
DEFENDANT W.R. GRACE &
CO.**

1 Plaintiff hereby requests the Clerk to enter a default against Defendant W.R. Grace & Co.
2 on the basis that the record in this case demonstrates that there has been a failure to plead or
3 otherwise defend as provided by Rule 55(a) of the Federal Rules of Civil Procedure.

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5 Respectfully submitted on this 13th day of September 2021.

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9 _____
10 Plaintiff

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**AFFIDAVIT IN SUPPORT OF
APPLICATION FOR ENTRY OF
DEFAULT AGAINST
DEFENDANT W.R. GRACE &
CO.**

1 I, Rune Kraft, based on personal knowledge, declare:

2 Defendant W.R. Grace & Co. executed a waiver of the service of summons on May 24,
3 2021, as shown in Doc. 12, and failed to plead or otherwise defend as required by FRCP 12(a)(1).
4

5 I am competent to testify to the facts set forth in this declaration and declare under the
6 penalty of perjury of the laws of the United States of America that the foregoing statements are
7 true and correct.

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9 DATED this 13th day of September 2021.

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Plaintiff